

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley (1944-2013) Jodi Westbrook Flowers, <i>Co-Chair</i> Donald A. Migliori, <i>Co-Chair</i> Robert T. Haeefe, <i>Liaison Counsel</i> MOTLEY RICE LLC	Stephen A. Cozen, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF

March 7, 2024

The Honorable Sarah Netburn, U.S. Magistrate Judge
United States District Court for the S.D.N.Y.
Thurgood Marshall U.S. Courthouse, Room 430
40 Foley Square
New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

Plaintiffs write in reply to Saudi Arabia's letter (ECF No. 9617) opposing Plaintiffs' request for a three-week extension and additional pages for its surreply brief, ECF No. 9615.

Saudi Arabia's letter seeks to constrain unfairly Plaintiffs' responses to the hundreds of new factual and legal arguments it presents in its 1,868-page single-spaced "Response to Plaintiffs' Averment" (KSA Ex. 160). Saudi Arabia's Response—on its own—totals 1,378 double-spaced pages. Plaintiffs simply cannot be expected to address Saudi Arabia's more than 2,000 pages of filings in the current three-week span allotted and within a 20-page brief. The additional time and page-limit Plaintiffs have requested is necessary for Plaintiffs to undertake a proper review of Saudi Arabia's submissions, and to determine whether and how its new arguments should best be addressed. Plaintiffs promptly consented to Saudi Arabia's request for a one-month extension with the sole condition that Saudi Arabia extend reciprocal courtesy if Plaintiffs deemed it necessary. Our meet-and-confer agreement should be respected.

Plaintiffs again respectfully request that the Court grant their reasonable request for an extension until April 15, 2024, and a 30-page limit for their surreply brief.

Respectfully submitted,

COZEN O'CONNOR

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The Honorable Sarah Netburn

March 7, 2024

Page 2

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cc: The Honorable George B. Daniels, via ECF
All Counsel of Record via ECF